



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10

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OFFICE OF
ECOSYSTEMS,
TRIBAL AND PUBLIC
AFFAIRS

August 7, 2014

Erich T. Orth
Project Manager
Bonneville Power Administration
Public Affairs-DKE-7
P.O. Box 14428
Portland, Oregon 97293-4428

Re: Comments on the SDEIS for Hooper Springs Transmission Project (EPA Project Number 10-034-BPA).

Dear Mr Orth:

In accordance with our responsibilities under the Clean Air Act §309, the National Environmental Policy Act, and the Council on Environmental Quality regulations for implementing NEPA, the U.S. Environmental Protection Agency has reviewed the Bonneville Power Administration (BPA) Supplemental Draft Environmental Impact Statement (SDEIS) for the proposed **Hooper Springs Transmission Project** in Caribou County, Idaho.

The SDEIS analyzes potential environmental impacts of a new route option (Option 3A) for the South Alternative, which was developed after completion of the draft EIS for the project and examination of inputs received from the public. Option 3A route would be 24 miles long and would generally follow the same route as Option 3 of the same Alternative, with the exception of two segments. The first segment is a 3.5-miles portion to the west of the Blackfoot River Narrows, which was to avoid private land to the south and associated large wetland area. The other is a 2.5-mile long segment at the eastern end of this route, which was chosen to avoid crossing areas on the Caribou-Targhee National Forest (C-TNF) and the Blackfoot River Wildlife Management Area subject to mining leases associated with the Husky-North Dry Ridge Mine, as well as the North Maybe Investigation Area. The SDEIS identifies the modified South Alternative, Option 3A, as BPA's Preferred Alternative and route.

In our comments on the draft EIS in April 2013, the EPA expressed concerns about the proposed project due to its potential impacts to water, land use and farmlands, and vegetation and wildlife resources. We appreciate BPA responses to our comments in the SDEIS. In particular, we are pleased with BPA's anticipated measures to protect water resources and avoid sensitive resource areas, such as the Blackfoot River Wildlife Management Area and wetlands, as much as possible.

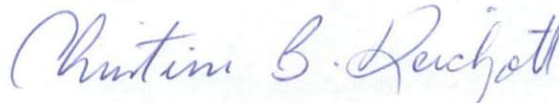
Since the additional route option 3A does not introduce new impacts or significantly affect the extent of impacts previously analyzed in the draft EIS, we would support its implementation along with mitigation measures identified in the SDEIS. Because the project will require a number of permits, including Clean Water Act Section 401, 402 and 404 (p. 4-6), the final EIS should include information on the status of those permit applications and measures to protect water quality. In addition, the final EIS should include outcomes of planned consultations with the US Fish and Wildlife Service on

potential migratory birds' impacts and recommended measures to reduce risks and protect biota and habitat.

Based on our review, we believe that the SDEIS provides adequate discussion of the potential environmental impacts associated with the proposed action, including the additional route option 3A. The EPA, therefore, has rated the SDEIS as LO (Lack of Objections). An explanation of this rating is enclosed for your reference.

We appreciate the opportunity to review this SDEIS. If you have question about our comments, please contact me at (206) 553-1601 or by electronic mail at reichgott.christine@epa.gov, or you may contact Theo Mbabaliye of my staff at (206) 553-6322 or electronic mail at mbabaliye.theogene@epa.gov.

Sincerely,

A handwritten signature in blue ink that reads "Christine B. Reichgott". The signature is written in a cursive, flowing style.

Christine B. Reichgott, Manager
Environmental Review and Sediment Management Unit

Enclosure

1. EPA Rating System

**U.S. Environmental Protection Agency Rating System for
Draft Environmental Impact Statements
Definitions and Follow-Up Action***

Environmental Impact of the Action

LO – Lack of Objections

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC – Environmental Concerns

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO – Environmental Objections

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU – Environmentally Unsatisfactory

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 – Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 – Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 – Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.